

## **Amherst College Time and Effort Policy**

**Effective Date: January 1, 2015**

**Last Updated: October 7, 2015**

Per federal grant regulations A-21 (section J.10.c.2.) and CFR 200 (section 200.430 Compensation-personal services), charges to federal awards for salaries and wages must be based on after-the-fact activity reports that accurately reflect the work performed. Salaries and wages charged to federal grants should be consistent with effort expended. The purposes of time and effort reporting are to 1) record all effort expended on grants regardless of compensation received for effort and 2) verify that the percentage of effort spent on a federal grant is not less than the percentage of salary charged to the grant.

### **Time and Effort System**

Amherst College uses an after-the-fact time and effort system to comply with the federal regulations. Compensation is paid based on estimates of effort before the services are performed. The time and effort reports record the actual percentage distribution of all effort expended including time spent on the grant as well as other duties. 100% effort is defined as all effort needed to complete the full set of duties included in Amherst College appointments. Because the number of hours worked per day or week varies for each faculty or staff member, effort is not defined by a specific number of hours. Rather it is based on percentages calculated by dividing time spent on one activity by time spent on all activities related to the College appointment and grant activities. The percent effort for federal research is accounted for separately from other duties at the College such as teaching, administrative work, public service and work on private grants.

Time and Effort reports are completed by all faculty and FLSA exempt professional staff involved with federal grants, even if no compensation is received. Employees who work on a grant as part of a cost share requirement are also required to complete these reports. The reports are not completed by non-exempt staff or students that fill out weekly or bi-weekly timesheets. Timesheets serve as after-the-fact reports of actual effort spent on the grant and fulfill the federal requirements for documentation.

Principal Investigators are responsible for verifying that the information provided by all employees working on their grants is accurate.

### **Frequency of Reporting**

Time and Effort reports are completed by all faculty and professional staff three times per calendar year. The reporting template is available on the Amherst College website and is

distributed to all applicable employee. Completed reports are sent to the Grant Analyst in the Controller's Office within 30 days of distribution of the reporting forms. The reporting periods are as follows:

1. Spring (January 1 to May 31)
2. Summer (June 1 to August 31)
3. Fall (September 1 to December 31)

### **Review of Reports**

If there is a significant difference (>10%) between the time and effort report and compensation, the compensation is adjusted to reflect actual effort expended. The College as well as the federal regulations recognizes that short term fluctuations (such as one or two months) between workload categories may occur. These fluctuations are acceptable if the distribution of salaries over the longer term is reasonable and the final amount charged to the grant is accurate, allowable, and properly allocated. If actual effort expended is less than effort compensated for, the difference in compensation paid is returned to Amherst College by the employee.

### **Special Considerations**

A reduction in effort of more than 25% requires approval from the federal agency. Please contact the Grant Analyst if you foresee a significant reduction in effort so a request to the funder can be sent.

Federal funder approval is required for an absence from the project in excess of 90 days. Please contact the Grant Analyst as far in advance as possible to discuss the absence from the project and to send a request to the funder for approval.

### **Additional Resources for Information**

Grants with start dates prior to December 26, 2014 follow the federal guidelines outlined in Circular A-21. The entire guidance is available online by clicking on the link below:

[http://www.whitehouse.gov/omb/circulars\\_a021\\_2004/#j](http://www.whitehouse.gov/omb/circulars_a021_2004/#j)

Grants with start dates on or after December 26, 2014 follow the federal guidelines outlined in 2 CFR Part 200. The entire guidance is available online by clicking on the link below:

[http://www.ecfr.gov/cgi-bin/text-idx?SID=75db4c74bd455c57c134fd5b890b7ea0&node=pt2.1.200&rgn=div5#se2.1.200\\_1430](http://www.ecfr.gov/cgi-bin/text-idx?SID=75db4c74bd455c57c134fd5b890b7ea0&node=pt2.1.200&rgn=div5#se2.1.200_1430)

If you have any questions, please contact the Grant Analyst at x2804.